

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: VLADIMIR ALBERT Debtor, TOYOTA LEASE TRUST, Movant, v. VLADIMIR ALBERT, and KENNETH E. WEST, Trustee, Respondents.	Bankruptcy No. 22-12041-amc Chapter 13
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MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Toyota Lease Trust (the “Movant”), by and through its undersigned counsel, Bernstein-Burkley, P.C., and files this Motion for Relief from the Automatic Stay (the “Motion”), representing as follows:

THE PARTIES

1. Respondent, Vladimir Albert (the “Debtor”), is an adult individual with a place of residence located at 2409 Tremont Street, 2nd Floor, Philadelphia, PA 19115.
2. Kenneth E. West is the duly appointed Chapter 13 Trustee and is currently acting in such capacity.

JURISDICTION AND VENUE

3. This matter is a core proceeding and this Court has jurisdiction pursuant to 28 U.S.C. § 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. Movant seeks relief pursuant to 11 U.S.C. § 362(d) and FRBP 4001 and 9014.

FACTUAL BACKGROUND

4. On or about August 4, 2022 (the “Petition Date”), Debtor filed a voluntary petition for relief pursuant to Chapter 13 of the Bankruptcy Code.

5. On or about December 13, 2021, Debtor leased a 2022 Lexus GX460 VIN: JTJAM7BX0N5312192 (the “Vehicle”), pursuant to a Motor Vehicle Lease Agreement (the “Lease”) with the Movant, a true and correct copy of which is attached hereto as **Exhibit A**.

6. Movant has a secured interest in the Vehicle, as evidenced by the Certificate of Title attached hereto as **Exhibit B**.

7. The lease matured on March 13, 2025, and therefore, the Movant no longer has a contractual relationship with the Debtors.

8. The total residual payoff of the Lease as of March 20, 2025, was \$37,588.20.

9. The J.D. Power value for the 2022 Lexus GX460 VIN: JTJAM7BX0N5312192 is \$44,475.00, the J.D. Power report is attached hereto as **Exhibit C**.

10. Movant is entitled to relief from the automatic stay for cause, including lack of adequate protection, because the Movant no longer has a contractual relationship with the Debtor. 11 U.S.C. §362(d)(1).

WHEREFORE, Movant, Toyota Lease Trust respectfully requests that this Honorable Court enter an Order, pursuant to 11 U.S.C. § 362(d), granting Movant relief from stay with respect to the 2022 Lexus GX460 VIN: JTJAM7BX0N5312192.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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Dated: March 25, 2025

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